

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a)	
ADAMSWELLS; and CONSOLIDATED)	
TELEPHONE COMPANY d/b/a CTC)	
)	
Plaintiff,)	No. 1:19-cv-07190
)	
vs.)	Judge John Z. Lee
)	Magistrate Judge Jeffrey T. Gilbert
T-MOBILE USA, INC.; and)	
INTELIQUENT, INC.)	
)	
Defendants.)	

**INTELIQUENT INC.'S MOTION
FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Inteliquent, Inc. (Inteliquent”), respectfully moves pursuant Local Rules 5.8 and 26.2 for leave to seal select text from Inteliquent’s Surreply to Address (1) New Matters the Plaintiffs Raised In Their Reply; (2) the Plaintiffs’ Disavowal Of Their Only Claim Against Inteliquent; and (3) the Plaintiffs’ Endemic Rule 37.2 Violations (the “Surreply”) and the exhibit filed in support of its Surreply (Ex. U). In support of this request, Inteliquent states:

1. All the documents listed above are being filed concurrently with the present motion to seal.

2. The document listed above and the redacted portions of Inteliquent’s Surreply rely on or directly quote documents referencing certain confidential business and contractual matters that the parties or third parties responding to discovery have designated as Confidential pursuant to the Confidentiality Order (ECF 164) entered in this case. The Confidentiality Order limits the disclosure of those documents. (*Id.* ¶ 5.) The materials also respond to redacted and sealed portions of the plaintiffs’ motion. (ECF 226.)

3. Good cause exists to file these materials under seal because disclosure of the information related to the parties' confidential business arrangements and competitively sensitive information would almost certainly put one or more of the parties or the third parties that responded to discovery at a disadvantage in the highly competitive telecommunications marketplace in which they operate. The materials being filed under seal include "information that reveals trade secrets" and "research, technical, commercial or financial information...maintained as confidential." (ECF 164 ¶ 2(a).)

4. Further, to comply with the confidentiality obligations under relevant contracts involving Inteliquent, and in the interest of justice, Inteliquent is requesting that the Court permit Inteliquent to file confidential materials in connection with its Surreply.

5. Along with this motion, Inteliquent is filing a public version of its Surreply from which the confidential portions have been redacted. This redacted version of the Surreply will remain on the docket to ensure public access to the non-confidential portions of Inteliquent's filings.

WHEREFORE, Inteliquent requests that this Court should grant this Motion and enter an order giving Inteliquent leave to file under seal the redacted portions of its Surreply and the exhibit thereto designated as Confidential.

Dated: March 16, 2022

Respectfully submitted,

By: /s/ John J. Hamill

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Attorneys for Inteliquent, Inc.

CERTIFICATE OF SERVICE

The undersigned attorney, on oath, certifies that on March 16, 2022 he served the foregoing **Motion for Leave to File Documents Under Seal** via the ECF system to all parties that have consented to same in accordance with applicable Federal Rules of Civil Procedure and Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/ John J. Hamill
John J. Hamill